

# EXHIBIT 20

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

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RUSSELL, et al.

Plaintiffs,

v.

HARRIS COUNTY, TEXAS, et al.

Defendants.

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Case No. 4:19-cv-00226  
(Class Action)  
The Honorable Lee H. Rosenthal  
U.S. District Judge

**DECLARATION OF PRIYANKA SHETTY**

I, Priyanka Shetty declare and affirm the following:

1. I am over the age of 18 and competent to make this Declaration.
2. I am an Investigative Fellow at Civil Rights Corps, which represents the Plaintiffs in this case.
3. Plaintiffs' Statement of Undisputed Material Facts cites several video clips of 15.17 hearings conducted in Harris County, Texas, between January 18, 2019, and August 5, 2022. *See* Exhibits 45-71.
4. Plaintiffs' counsel received longer videos containing those clips from Sylvia Cherry, the Harris County Court Services Director (hereinafter "the County"). As of November 8, 2022, the County has provided videos of each docket occurring on the first seven days of every month from January 1, 2018, through September 7, 2022, in addition to videos of other dockets specifically requested by counsel for Plaintiffs. The County provided the videos through a secure, temporary online link. The link contained one video per docket, with each docket consisting of multiple 15.17 hearings.

5. Plaintiffs retained the services of a volunteer named Holly McGowan to help review videos of 15.17 hearings occurring in 2022. I supervised Ms. McGowan's work.
6. I randomly selected an assortment of 15.17 hearing dockets occurring between January 1, 2022, and May 7, 2022, for Ms. McGowan to review. In total, Ms. McGowan watched 9 dockets, containing a total of 53 individual 15.17 hearings for arrestees charged with felony offenses.
7. Among all 53 individual 15.17 hearings occurring between January 1 and May 7, 2022, that Ms. McGowan she did not observe a single hearing in which an arrestee accused of a felony offense received an unsecured (or "personal") bond.
8. Plaintiffs' counsel then selected an assortment of 15.17 hearing videos—including three from the dockets reviewed by Ms. McGowan—to be included as exhibits to Plaintiffs' Statement of Undisputed Material Facts. *See* Ex. 45-71.
9. To prepare each 15.17 hearing video exhibit cited in the Plaintiffs' Statement of Undisputed Material Facts filing, I used iMovie video software to clip the relevant individual 15.17 hearing from the longer docket video. *See id.* Then, to create public versions of these video exhibits, I used Adobe Premier Pro Software to blur the portion of the screen portraying the arrestee. No other modifications were made to these videos. The video clips in Plaintiffs' Exhibit 45-71 are true and accurate copies of the corresponding video footage provided by the County.

I declare under penalty of perjury that the above information is true and correct to the best of my knowledge.

  
\_\_\_\_\_  
Priyanka Shetty

11/17/2022  
\_\_\_\_\_  
Date